

EXHIBIT D

EXHIBIT D

**DECLARATION OF MICKEY GRIFFIN
IN SUPPORT OF LEGACY PROPERTIES, LLC'S
MOTION FOR RELIEF FROM STAY**

I, MICKEY GRIFFIN, do declare:

1. I am the manager of Legacy Properties, LLC, whose Nevada entity Number is E023530212-7 and have binding decision making authority for said business entity.

2. On or about June 30, 2017, Legacy Properties, LLC ("Legacy") became title holder of the residential real property located at 6550 Laredo St., Las Vegas, NV APN 163-11-103-021 ("property") as evidenced by the Grant Bargain Deed Clark County Recorder Document Number 20170630-0002090.

3. To date, neither Parnell Colvin (“Colvin”) nor Monique Brown (“Brown”) has made any payments of rent or lease or compensation for their occupancy of the property to Legacy.

4. The lease agreement between Colvin, Brown, and Estate of Susan Waters terminated on February 28, 2017.

5. Since February 28, 2017, Colvin and Brown have made not payments either the Estate of Susan Water of Legacy.

6. Legacy has no rental or lease agreement with Colvin.

7. Legacy has no rental or lease agreement with Brown.

8. On or about June 30, 2017, Michael Lucas, an agent of Legacy, personally delivered a copy of the recorded Deed in Favor of Legacy.

9. Between June 30, 2017 to July 11, 2017, I personally made multiple attempts to contact and discuss the ownership and occupancy of the property in question with Colvin and Brown, to no avail.

1 10. On or about July 11, 2017 Debtor and Colvin informed Legacy that the recorded
2 deed was a “fraud,” that Legacy did not own the property, and that Debtor and/or Colvin
3 would make no payments to Legacy regarding their occupancy of the property.

4 11. On or about July 12, 2017, the police and I arrived at the property to discuss the
5 occupancy and ownership thereof with Brown and Colvin; both Brown and Colvin refused
6 to answer the door.

7 12. On or about July 19, 2017, I transmitted a picture of the assessors’ website to Brown
8 and Colvin stating Legacy was the property owner; both Brown and Colvin refused to
9 respond and continued to assert Legacy was not the title holder of the property.

10 13. On or about July 21, 2017, I contacted Debtor and Colvin to offer \$2,000 cash to
11 move out by August 2, 2017; both Brown and Colvin refused to respond.

12 14. On or about August 18, 2017, when Debtor and Colvin received the five (5) day pay
13 or quit notice, Debtor and Colvin informed Legacy, via text message, that Debtor and
14 Colvin intended to file “another bankruptcy” in order to avoid the eviction proceeding and
15 order granting relief from stay.

16 15. In addition to the house occupied by Debtor and Colvin, the property has an
17 apartment, which may be rented, but for the actions of Brown and Colvin.

18 16. Legacy is unable to rent or obtain any useful economic value of the apartment not
19 occupied by Brown and Colvin due to the actions and threats of Brown and Colvin.

20 17. Legacy suffers damages by the continued occupancy of the property by Colvin and
21 Brown.

22 ...

23 ...

24 ...

1 18. Legacy is entitled to evict Colvin and Brown.

2 I declare under penalty of perjury under the law of the State of Nevada that the foregoing is
3 true and correct.

4 Executed this 8th day of September, 2017, in Las Vegas, Nevada.

5 
6 _____
7 Mickey Griffin

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Law Offices
O'REILLY LAW GROUP, LLC
A NEVADA LIMITED LIABILITY COMPANY INCLUDING CORPORATIONS
325 South Maryland Parkway • Las Vegas, Nevada 89101
Telephone (702) 382-2500 • Facsimile (702) 384-6266